

As the general manager of a captioning company in North Carolina, Caption Perfect, Inc., I want to assure the FCC that implementing editorial quality standards would be helpful both for consumers and for the captioning industry. We support the requests made in the petition from TDI, National Association of the Deaf, Self Help for Hard of Hearing People, the Association of Late-Deafened Adults, and the Deaf and Hard of Hearing Consumer Advocacy Network submitted to the FCC on July 23, 2004. These are reasonable requests.

For prerecorded programming, we urge that the FCC adopt time-tested standards developed by the U.S. Department of Education's Captioned Media Program. Caption Perfect, Inc. adopted this standard when we began providing service in 1992 because the standard was developed over decades and was based on careful research. As a result, our captioning is highly readable and is appropriate for the intended audience. This manual, known as the "Captioning Key," addresses critical issues, especially those involving presentation rate, synchronicity, and caption placement. This document may be found at <http://www.cfv.org/caai/nadh7.pdf>

Currently, most captioning companies fail to monitor or adjust presentation rates. As a result, captions may appear at rates of 400 words per minute or more at times. The "Captioning Key" specifies methodologies that we use to improve readability, and we are often able to do this while preserving verbatim text. Studies have consistently shown that most people cannot read faster than 235 words per minute. There are times when text must be edited to meet this standard, but usually this can be done by removing nonessential text.

Children can only read between 120 to 130 words per minute, and substantial editing is usually required for this audience. But if presentation rates are not controlled, captioning will not be accessible to a large number of viewers. Also, if acceptable presentation rates are achieved by allowing captions to lag more than a second, it can become difficult to determine who is speaking. The "Captioning Key" suggests presentation rates and synchronicity standards that are achievable for adults and children. Indeed, most of the large captioning companies have captioned programs for the

U.S. Department of Education using this standard over several decades, so this must be considered a time-tested, achievable standard. We ask that the "Captioning Key" be entered into these proceedings and that the FCC consider adopting it as a national standard. <http://www.cfv.org/caai/nadh7.pdf>

While pop-on captioning is considered to be the best way to caption prerecorded programming, many captioning companies are now using roll-up captioning, even when this method is clearly inappropriate.

While roll-up captioning is cheaper than pop-on captioning, roll-up captioning often obscures significant visual elements in a program, particularly name keys. While roll-up captioning can be moved to the top of the screen or to other vertical positions, doing so often obscures a subject's face. Roll-up captioning usually requires additional text to describe who is speaking, and this can raise presentation rates unnecessarily. Most roll-up captioning does not include speaker IDs, and this makes it difficult to determine who is talking. Speaker identification is crucial to understanding the context of dialog. Since a properly placed pop-on captioning can describe who is speaking, it is a natural, time-tested, and audience-approved method. We urge the FCC to firmly reject roll-up captioning for prerecorded programming. Further, it should be considered unacceptable for any prerecorded captioning to obscure important visual elements.

There are very few reasons why prerecorded captions should have errors. While we do make mistakes and will continue to do so in the future, we have been able to reduce our error rates for prerecorded captioning simply by having scripts reviewed by a proofreader. There is no excuse to have an error rate of greater than 2 out of every 1,000 words (or .2%.) as suggested by the FCC's Notice of Proposed Rulemaking. But we believe that this error rate should be much lower and believe that a maximum error rate of 1 out of every 1,000 words (or .1%) is easy to achieve for most captioning companies.

While there should be greater room for error in the provision of realtime captioning, Caption Perfect, Inc. provides realtime services as well, and we only hire writers who demonstrate total error rates of 5 out of every 1,000 words (or .5%) or less. Some of

the nation's largest captioning companies have error rates that are typically 5%--10 times our minimum standard. This represents an error every 20 words--roughly one error for every sentence. Because captions appear on screen for just a few seconds, error rates this high are incomprehensible and are virtually useless.

The FCC's Notice of Proposed Rulemaking suggested a maximum error rate of 3%, but this represents an error every 60 words--roughly one error for every paragraph--6 times our minimum standard. We have proven that higher quality rates are attainable, and, with advances in technology, we expect that these rates will improve over time. Should the FCC agree to low standards for realtime captioning, we urge it to require phased improvements in quality over the next two or three years.

Before adopting any standard, however, we urge the FCC commissioners to watch programming that barely meets the proposed allowable error rate. By all means, it should not accept the opinion of the captioning industry (Caption Perfect, Inc. included) as gospel. The captioning industry, by and large, represents the opinions of those who pay them--namely the video program producers and distributors. In my opinion, the FCC has a duty to represent those who depend on captioning and not those who profit from it.

Finally, we believe that the FCC could improve the quality of captioning by requiring broadcasters to educate viewers about the standards the FCC adopts and how to file a complaint. This could be done through public service announcements, for example. We would also encourage the FCC to require each broadcaster to form an independent advisory board of deaf and hard-of-hearing viewers that would review the broadcaster's captioning and report to the FCC on a regular basis.

We greatly appreciate the interest the FCC has taken to respond to the petitioners, and we look forward to improvements in American captioning.

Burwell Ware
General Manager
Caption Perfect, Inc.
Suite 115, 125 Kingston Drive
Chapel Hill, NC 27514-1630

919-942-0693 voice

919-942-0435 fax

919-942-0436 tty